



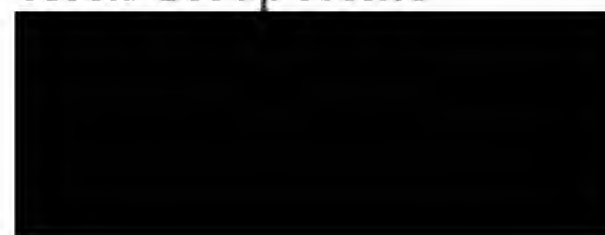
**pennsylvania**  
DEPARTMENT OF HUMAN SERVICES

Mr. Kevin Snyder, CEO  
Bethany Home, Inc.



AUG 03 2017

RE: Keck Group Home



Dear Mr. Snyder:

As a result of the Department of Human Services', Office of Children, Youth and Families, annual licensing inspection on March 20, 2017 thru March 23, 2017 of the above listed facility, the violations with Title 55, PA Code, Chapter 3800 specified on the enclosed Licensing Inspection Summary were found.

All violations specified on the enclosed Licensing Inspection Summary must be corrected by the dates specified on the Licensing Inspection Summary and continued compliance with Title 55, PA Code, Chapter 3800 must be maintained.

Sincerely,

Cathy Utz,  
Deputy Secretary

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT**  
**CHILD RESIDENTIAL LICENSING - 55 Pa.Code Chapter 3800**

Facility Name: KECK GROUP HOME		License Number: 24580
Address: [REDACTED]		County: Berks
Director: Eliane Gilbert		Region: NORTHEAST
Legal Entity Name: BETHANY HOME INC		
Legal Entity Address: [REDACTED]		
<b>Certificate(s) of Occupancy</b> C-2 LP 06/11/1999 LI		
Program Type: Residential Services	Licensed Capacity: 12	Number of Children Served: 12
Type of Inspection: Full	BHA Docket Number:	Notice: Announced
Reason(s) for Inspection(s) Renewal		
<b>On-Site Inspections Dates and Department Representatives On-Site</b> 03/20/2017: Piazza, Gerard; Bosack, Amie; Piazza, Mark; Roman, Erin 03/21/2017: Piazza, Gerard; Bosack, Amie; Piazza, Mark; Roman, Erin 03/22/2017: Piazza, Gerard; Bosack, Amie; Piazza, Mark; Roman, Erin 03/23/2017: Piazza, Gerard; Bosack, Amie; Piazza, Mark; Roman, Erin		
<b>Off-Site Inspection Dates and Inspectors, if Applicable</b>        		
<b>Other Details</b> Partial or Full Triggers: _____ Random Indicators: _____		
<b>Child Demographic Data as of Inspection Dates</b>		
<b>Age of Children:</b> 0 to 5 years: 0 6 to 13 years: 0 14 to 17 years: 9 18 to 21 years: 1	<b>Number of Children who:</b> Are Adjudicated Delinquent: 1 Are Dependent: 9 Have Mental Illness: 10 Have an Intellectual Disability: 0 Have a Physical Disability: 0	

Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard	
Facility Name: KECK GROUP HOME	
<b>1. REGULATION 55 Pa.Code §3800</b> 3800.31(d) - A statement signed by the child, the child's parent and, if applicable, the child's guardian or custodian, acknowledging receipt of a copy of the information specified in subsection (a), or documentation of efforts made to obtain the signature, shall be kept.	
<b>2a. DESCRIPTION OF VIOLATION</b> Child # 1 was admitted to the facility on [REDACTED] A signed copy of the child's rights, the grievance procedures, and applicable consent to treatment protections was signed on [REDACTED] and not upon admission.	
<b>3. PLAN OF CORRECTION (POC)</b> (Attach pages as necessary. Remember that you must sign and date any attached pages.) Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.	
See attached	
Repeat Violation: No	Date(s) of Previous Violation(s):
Signature of Legal Entity Representative (Required on EVERY Page)	
Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Amy Sterner, Director of QA	
Date 4/7/17	
<b>DEPARTMENT USE ONLY - FACILITIES MAY NOT WRITE BELOW THIS LINE!</b>	
The above plan of correction is approved as of <u>4-7-17</u> (Date)	Plan of correction implementation status as of <u>5-15-17</u> (Date)
The above plan of correction was approved by <u>AS</u> (Initials)	<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented

Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard  
 Facility Name: KECK GROUP HOME

1. REGULATION 55 Pa.Code §3800

3800.32(g) - A child has the right to receive and send mail.

2a. DESCRIPTION OF VIOLATION

Based on interviews with staff and children, it was discovered that certain mail is not being received by children but is being marked as return to sender.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

*See attached*

Repeat Violation: No

Date(s) of Previous Violation(s):

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Printed Name and Title of Legal Entity Representative  
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Date 4/7/17

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 (Date)

The above plan of correction was approved by BW  
 (Initials)

Plan of correction implementation status as of 4-7-17  
 (Date)

- ☐ Fully Implemented
- ☒ Partially Implemented - Adequate Progress
- ☐ Partially Implemented - Inadequate Progress
- ☐ Not Implemented

Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard

Facility Name: KECK GROUP HOME

## 1. REGULATION 55 Pa.Code §3800

3800.32(g)(2) - Incoming mail from Federal, State or county officials, or from the child's attorney, may not be opened or read by staff persons.

## 2a. DESCRIPTION OF VIOLATION

Based on interviews with staff and children, it was discovered that mail is being read by facility staff.

## 3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

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Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard  
 Facility Name: KECK GROUP HOME

1. REGULATION 55 Pa.Code §3800

3800.58(e) - Each staff person who will have regular and significant direct contact with children, shall complete training in first aid, Heimlich techniques and cardiopulmonary resuscitation at least every year. If a staff person has a formal certification from a recognized health care organization which is valid for more than 1 year, retraining is not required until expiration of the certification.

2a. DESCRIPTION OF VIOLATION

Staff Member A initial training in first aid, Heimlich, and CPR was completed on 03/17/14. The following training was not completed until 04/18/16.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

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Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard  
 Facility Name: KECK GROUP HOME

1. REGULATION 55 Pa.Code §3800

3800.82(a) - Poisonous materials shall be kept locked and inaccessible to children.

2a. DESCRIPTION OF VIOLATION

The janitor closet in the ABC building contained a bottle with a hand written label entitled "clorox".

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

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GH  
 (Initials)



Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard			
Facility Name: KECK GROUP HOME			
1. REGULATION 55 Pa.Code §3800 3800.87(a) - Floors, walls, ceilings, windows, doors and other surfaces shall be free of hazards.			
2a. DESCRIPTION OF VIOLATION The basement of the Church contains a column with a hanging mirror. This mirror features a broken area in the top right corner approximately 3 inches.			
3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.) <i>Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.</i>			
See attached			
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Printed Name and Title of Legal Entity Representative (Required on EVERY Page)			Date
Amy Steiner, Director of QA			4/7/17
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Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard

Facility Name: KECK GROUP HOME

**1. REGULATION 55 Pa.Code §3800**

3800.143 (a) - A child shall have a health examination within 15 days after admission and annually thereafter, or more frequently as specified at specific ages in the periodicity schedule recommended by the American Academy of Pediatrics, "Guidelines for Health Supervision," available from 141 Northwest Point Boulevard, Post Office Box 927, Elk Grove Village, Illinois, 60009-0927.

**2a. DESCRIPTION OF VIOLATION**

Child # 1 was admitted to the facility on [REDACTED] health examination for Child # 1 was not completed until [REDACTED]

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

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Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard  
 Facility Name: KECK GROUP HOME

1. REGULATION 55 Pa.Code §3800

3800.144(b) - A child who is 3 years of age or older shall have a dental examination performed by a licensed dentist and teeth cleaning performed by a licensed dentist or dental technician at least semiannually. If a child has not had a dental examination and teeth cleaning within 6 months prior to admission, a dental examination and teeth cleaning shall be performed within 30 days after admission.

2a. DESCRIPTION OF VIOLATION

Child # 2 was admitted on [REDACTED] Child # 2 had only one dental examination completed in 2016, which occurred on [REDACTED]

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

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 (Initials)

Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard

Facility Name: KECK GROUP HOME

## 1. REGULATION 55 Pa.Code §3800

3800.184(a) - A medication log shall be kept to include the following for each child:

- (1) A list of prescription medications.
- (2) The prescribed dosage.
- (3) Possible side effects.
- (4) Contraindicated medications.
- (5) Specific administration instructions, if applicable.
- (6) The name of the prescribing physician.

## 2a. DESCRIPTION OF VIOLATION

Medication log did not include a list of contraindicated medications for all prescribed medications.

## 3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

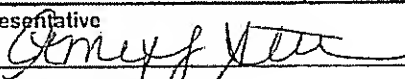
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Printed Name and Title of Legal Entity Representative  
(Required on EVERY Page)

Amy Werner, Director of QA

Date 4/7/17

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(Date)

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(Date)

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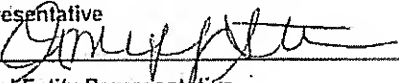
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☐ Partially Implemented - Inadequate Progress

☐ Not Implemented

The above plan of correction was approved by

BH  
(Initials)

Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard			
Facility Name: KECK GROUP HOME			
1. REGULATION 55 Pa.Code §3800 3800.224(d) - Documentation of reasonable efforts made to involve the child's parent and, if applicable, guardian or custodian, shall be kept.			
2a. DESCRIPTION OF VIOLATION Individual service plan for Child # 1 did not include documentation of reasonable efforts made to involve the child's parent in the development of the plan.  Individual service plan for Child # 3 did not include documentation of reasonable efforts made to involve the child's parent in the development of the plan.			
3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.) <i>Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.</i>			
See attached			
Repeat Violation: No		Date(s) of Previous Violation(s):	
Signature of Legal Entity Representative (Required on EVERY Page) 			
Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Amy Gerner, Director of QA			Date 4/7/17
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The above plan of correction was approved by <u>BW</u> (Initials)		<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented	

Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard	
Facility Name: KECK GROUP HOME	
1. REGULATION 55 Pa.Code §3800 3800.226 - An ISP shall include: (1) through (12).	
2a. DESCRIPTION OF VIOLATION Individual service plan for Child # 1 did not include monthly documentation of the child's progress on each goal.	
Individual service plan for Child # 2 did not include monthly documentation of the child's progress on each goal.	
Individual service plan for Child # 3 did not include monthly documentation of the child's progress on each goal.	
Individual service plan for Child # 4 did not include monthly documentation of the child's progress on each goal.	
3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.) <i>Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.</i>	
See attached	
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Signature of Legal Entity Representative (Required on EVERY Page)	
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Amy Sterner, Director of QA 4/7/17	
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The above plan of correction was approved by <u>BS</u> (Initials)	<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented

Licensing Inspection Summary: 24580 - 03/20/2017 - Piazza, Gerard

Facility Name: KECK GROUP HOME

**1. REGULATION 55 Pa.Code §3800**

3800.229 - Under 22 Pa. Code Chapters 11, 14 and 15 (relating to student attendance; special education services and programs; and protected handicapped students), each child who is of compulsory school age shall participate in a Department of Education-approved school program or an educational program under contract with the local public school district.

**2a. DESCRIPTION OF VIOLATION**

Child # 1 was admitted to the facility on [REDACTED]. The facility did not complete and send a "Notification of Admission to Facility or Institution and School Enrollment" form for Child # 1 until [REDACTED].

Child # 3 was admitted to the facility on [REDACTED]. The facility did not complete and send a "Notification of Admission to Facility or Institution and School Enrollment" form for Child # 1 until [REDACTED].

Child # 4 was admitted to the facility on [REDACTED]. The facility did not complete and send a "Notification of Admission to Facility or Institution and School Enrollment" form for Child # 1 until [REDACTED].

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

*See attached*

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative  
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Date 4/7/17

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4-7-17  
(Date)

Plan of correction implementation status as of

4-7-17  
(Date)☐ Fully Implemented☒ Partially Implemented - Adequate Progress☐ Partially Implemented - Inadequate Progress☐ Not Implemented

The above plan of correction was approved by

CH  
(Initials)

# Plan of Corrections for March 2017

A-1 BH 4-7-17

Keck Cottage	Immediate Fix	Long Term Solution	Person Monitoring the Implementation
<p><b>Compliance Code 3800.31(d)</b></p> <p>A statement signed by the child, the child's parent and, if applicable, the child's guardian or custodian, acknowledging receipt of a copy of the information specified in subsection (a), or documentation of efforts made to obtain the signature, shall be kept.</p>	<p><b>Violation:</b> Child #1 was admitted to the facility on [REDACTED]. A signed copy of the child's rights, the grievance procedures, and applicable consent to treatment protections was signed on [REDACTED] and not upon admission. [REDACTED]</p> <p><b>Immediate Fix:</b> By 5/30/17, it will be reviewed in Clinical Meeting that signed copy of child's rights, the grievance procedures, and applicable consent to treatment protections are signed on the day of admission.</p>	<p><b>Long Term Solution:</b></p> <p>Blank forms for the child's rights, the grievance procedures, and applicable consent to treatment protections will be in the intake packet and the clinician or case manager will ensure these are signed upon admission.</p>	<p><b>Person(s) Monitoring:</b> Executive Director</p>
<p><b>Compliance Code 3800.32(g)</b></p> <p>A child has the right to receive and send mail.</p>	<p><b>Violation:</b> Based on interviews with staff and children, it was discovered that certain mail is not being received by children but is being marked as return to sender.</p> <p><b>Immediate Fix:</b> By 5/30/17, in Clinical Meeting it will be reviewed with all Clinicians/Case Managers that all children</p>	<p><b>Long Term Solution:</b> If a court order is received that requires withholding mail from a specific individual to a specific child, Clinician/Case Manager will immediately complete and send a Request for Waiver of Regulation Form with the court order to BHSL. A copy of the waiver request will be kept in the child's clinical file.</p>	<p><b>Person(s) Monitoring:</b> Executive Director</p>

*Garry Sten*  
*Amy Sten*  
 Directors of  
 4/7/17  
 OA



# Plan of Corrections for March 2017

	<p>have the right to receive and send mail. Withholding a child's mail will only be permitted if there is a court order which is specific to an individual child.</p> <p>If there is a court order which is specific to an individual child, the Clinician/Case Manager will need to apply for a waiver of regulation. The Clinician/Case Manager will complete a request for waiver of regulation form, attach a copy of the court order to the request form, and send it to BHSL for review and approval.</p> <p>Immediately upon sending the waiver to BHLS, contact between the child and the identified individual via mail may cease.</p> <p>The waiver form as well as the information where to send the waiver is saved on the agency's shared drive for all staff to access.</p>		
<p><b>Compliance Code</b> 3800.32(g)(2)</p> <p>Incoming mail from Federal, State, or county officials, or</p>	<p><b>Violation:</b> Based on interviews with staff and children it was discovered that mail is being read by facility staff.</p>	<p><b>Long Term Solution:</b> All Clinical Staff will provide youth any incoming mail from Federal, State, or county officials, or from the child's</p>	<p><b>Person(s) Monitoring:</b> Executive Director</p>

A-2 B14 4-7-17

Emily Foster  
Amy Turner  
Director of OA  
4/7/17

## Plan of Corrections for March 2017

from the child's attorney, may not be opened or read by staff persons.	<b>Immediate Fix:</b> Any incoming mail for children is placed in the Clinical Staff's mailbox. By 5/30/17, in Clinical meeting it will be reviewed with all Clinical Staff that any incoming mail from Federal, State, or county officials, or from the child's attorney, may not be opened or read by staff persons.	attorney without opening the mail pending the child's name is noted on the outside of the envelope. If no name is noted on the outside of the envelope, the envelope will be opened to determine whom the mail belongs too but will not be read by Clinical Staff.	
<b>Compliance Code 3800.58(e)</b>  Each staff person who will have regular and significant direct contact with children, shall completed training in first aid, Heimlich techniques and cardiopulmonary resuscitation at least every year. If a staff person has a formal certification from a recognized health care organization which valid for more than 1 year, retraining is not required until expiration of the certification.	<b>Violation:</b> Staff Member A initial training in first aid, Heimlich, and CPR was completed on 3/17/14. The following training was not completed until 4/18/16. (Maria)  <b>Immediate Fix:</b> Staff member A returned from leave on [REDACTED] Staff member A completed first aid, Heimlich and CPR training on 4/18/16 prior to working with children. (See attached documentation)	<b>Long Term Solution:</b> Staff development department will monitor and track all records of training to ensure all mandated trainings are completed within required time frame. When possible due to advanced notice of upcoming leave, staff members going out on leave or FMLA, will complete training prior to departure to ensure they are up to date.	<b>Person(s) Monitoring:</b> Director of Staff Development
<b>Compliance Code 3800.82(a)</b>	<b>Violation:</b> The janitor closet in the ABC building contained a bottle	<b>Long Term Solution:</b> Staff will be reminded during April Team Meetings that any	<b>Person(s) Monitoring:</b>

A-3

AM

4-7-17

Cheryl Xtin  
 Amy Steiner  
 Director of QA  
 4/7/17

## Plan of Corrections for March 2017

Poisonous materials shall be kept locked and inaccessible to children.	<p>with a hand written label entitled "Clorox"</p> <p><b>Immediate Fix:</b> The bottle was locked and inaccessible to children, however, it was not in its original, labeled container. The bottle with hand written label was disposed of immediately.</p>	<p>poisonous materials shall be kept locked and remain in their original labeled container. If any staff notices a poisonous material not in its original, labeled container, it will be disposed of immediately.</p> <p>During monthly cottage inspections, staff will look to ensure all poisonous materials are in their original labeled container.</p>	Team Supervisors, Assistant Directors, Director of Quality Assurance
<p><b>Compliance Code 3800.87(a)</b></p> <p>Floors, walls, ceilings, windows, doors, and other surfaces shall be free of hazards.</p>	<p><b>Violation:</b> The basement of the Church contains a column with a hanging mirror. The mirror features a broken area in the top right corner approximately 3 inches</p> <p><b>Immediate Fix:</b> The mirror was removed by the maintenance department on 3/21/17.</p>	<p><b>Long Term Solution:</b> Staff will reminded during April Team Meetings that if any hazardous items are discovered in cottage or common buildings, a maintenance request will be sent immediately for removal of the item.</p> <p>During monthly cottage inspections, staff will look to ensure all floors, walls, ceilings, windows, doors, and other surfaces are free of hazards.</p>	<p><b>Person(s) Monitoring:</b> Team Supervisors, Assistant Directors, Director of Quality Assurance</p>
<p><b>Compliance Code 3800.143(a)</b></p>	<p><b>Violation:</b> Child #1 was admitted to the facility on [REDACTED] Health</p>	<p><b>Long Term Solution:</b> The health clinic staff will ensure that a physical exam is scheduled within 5 days of</p>	<p><b>Person(s) Monitoring:</b> Director of Health Services</p>

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<p>A child shall have a health examination within 15 days after admission and annually thereafter, or more frequently as specified at specific ages in the periodicity schedule recommended by the American Academy of Pediatrics, "Guidelines for Health Supervision."</p>	<p>examination was not completed until [REDACTED]</p> <p><b>Immediate Fix:</b> With the start of the new CRNP in October 2016, all files were reviewed to ensure children had received all necessary appointments. Upon discovering that Child #1 had not received [REDACTED] required physical examination, Child #1 was immediately scheduled for the appointment.</p>	<p>admission with Bethany CRNP. If CRNP cannot conduct the physical exam within the 15 days of arrival, arrangements will be made for the youth to be seen at Wernersville Family Practice or an urgent care facility to complete the health examination before 15 days.</p>	
<p><b>Compliance Code 3800.144(b)</b></p> <p>A child who is 3 years of age or older shall have a dental examination performed by a licensed dentist and teeth cleaning within 6 months prior to admission, a dental examination and teeth cleaning shall be performed within 30 days of admission</p>	<p><b>Violation:</b> Child #2 was admitted on [REDACTED] Child #2 had only one dental examination completed in 2016, which occurred on [REDACTED]</p> <p><b>Immediate Fix:</b> With the start of the new CRNP in October 2016, all files were reviewed to ensure children had received all necessary appointments. Upon discovering that Child 21 had not received his required dental examination, Child #2</p>	<p><b>Long Term Solution:</b> The Health Clinic staff will be responsible for scheduling all initial dental visits within 5 days of arrival to Bethany Children's Home. If insurance is not available and that is the preventing factoring for scheduling these appointments, youth will be scheduled for an appointment on day 30 and the health clinic will ask permission from CEO for Bethany to pay for initial appointment.</p>	<p><b>Person(s) Monitoring:</b> Director of Health Services</p>

*Angela J. [Signature]*  
 Amy Stener  
 Director of OA  
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	was immediately scheduled for the appointment.	Health Clinic staff will maintain a spreadsheet of every youth appointment and when they are due for additional appointments. Appointments will be scheduled as far in advance as possible, but no less than one month in advance to ensure youth are seen in a timely fashion.	
<b>Compliance Code</b> <b>3800.184(a)</b>  A medication log shall be kept to include the following for each child: <ol style="list-style-type: none"> <li>(1) A list of prescription medication</li> <li>(2) The prescribed dosage</li> <li>(3) Possible side effects</li> <li>(4) Contraindicated medications</li> <li>(5) Specific administration instructions, if applicable</li> <li>(6) The name of the prescribing physician.</li> </ol>	<b>Violation:</b> Medication log did not include a list of contraindicated medications for all prescribed medications.  <b>Immediate Fix:</b> On 3/23/17, Nursing department ordered and received Drug Handbook for every cottage which include contraindicated medications. All cottages currently have a copy of the 2017 Nursing Drug Handbook.	<b>Long Term Solution:</b> By 5/31/17, Health Clinic Staff will review Nursing Drug Handbook to ensure all medications that current children receive are included in the book. If any medications are not included, Nursing Staff will print a separate sheet to include in the book with the contraindicated medications listed. As new medications are received for children, Health Clinic Staff will review the Nursing Drug Handbook to ensure the medications are listed in the handbook. If any new medications are not included in the handbook, Nursing Staff will print a separate sheet to include in the	<b>Person(s) Monitoring:</b> Director of Health Services, Director of Quality Assurance

*Emily J. Stone*  
 Amy Stevens  
 Director of QA

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		book with the contraindicated medications listed.	
<p><b>Compliance Code</b> 3800.224(d)</p> <p>Documentation of reasonable efforts made to involve the child's parent and, if applicable guardian or custodian, shall be kept.</p>	<p><b>Violation:</b> Individual service plan for Child #1 did not include documentation of reasonable efforts to involve the child's parent in the development of the plan.</p> <p>Individual service plan for Child #3 did not include documentation of reasonable efforts to involve the child's parent in the development of the plan.</p> <p><b>Immediate Fix:</b> In the new ISP training that will be provided to clinical staff members on 4/10/17, 4/17/2017 and 4/24/17 it discusses the importance of collaboration with the youth's guardian in the creation of the goals. The training states that documentation needs to occur when clinical team members have attempted to solicit information and feedback from guardians.</p>	<p><b>Long Term Solution:</b></p> <p>Any new clinical staff will be provided the training during their onboarding.</p>	<p><b>Person(s) Monitoring:</b> Executive Director</p>

*Erin J. Allen*  
*Amy Steiner*  
*Director of ODA*

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<p><b>Compliance Code 3800.226</b></p> <p>An ISP shall include (1) through (12).</p>	<p><b>Violation:</b>                      Individual service plan for Child #1 did not include monthly documentation of the child's progress on each goal.</p> <p>Individual service plan for Child #2 did not include monthly documentation of the child's progress on each goal.</p> <p>Individual service plan for Child #3 did not include monthly documentation of the child's progress on each goal.</p> <p>Individual service plan for Child #4 did not include monthly documentation of the child's progress on each goal.</p> <p><b>Immediate Fix:</b>                      Per the new ISP procedure that has been developed for the clinical team, progress on ISP goals are updated every 30 days and goals will be updated every 90 days.</p>	<p><b>Long Term Solution:</b></p> <p>A Clinical Operations Guide has been created and this updated procedure is listed in the guide. This guide will be reviewed with all new clinical staff during their onboarding.</p>	<p><b>Person(s) Monitoring:</b>                      Executive Director</p>
<p><b>Compliance Code 3800.229</b></p> <p>Under 22 Pa. Code Chapters 11, 14, and 15 (relating to student attendance; special</p>	<p><b>Violation:</b>                      Child #1 was admitted to the facility on [REDACTED]. The facility did not complete and send a "Notification of</p>	<p><b>Long Term Solution:</b>                      The assigned agency personnel will continue to submit the Notification of Admission to Facility or Institution and</p>	<p><b>Person(s) Monitoring:</b>                      Executive Director, Director of Quality Assurance</p>

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 Amy Sten  
 Director of DA

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<p>education services and programs; and protected handicapped students), each child who is of compulsory school age shall participate in a Department of Education-approved school program or an educational program under contract with the local public school district.</p>	<p>Admission to Facility or Institution and School Enrollment" form for Child #1 until [REDACTED]</p> <p>Child #3 was admitted to the facility on [REDACTED]. The facility did not complete and send a "Notification of Admission to Facility or Institution and School Enrollment" form for Child #3 until [REDACTED]</p> <p>Child #4 was admitted to the facility on [REDACTED]. The facility did not complete and send a "Notification of Admission to Facility or Institution and School Enrollment" form for Child #4 until [REDACTED]</p> <p><b>Immediate Fix:</b> While the regulatory clarification issued in November 2016 stated the Notification of Admission to Facility and School Enrollment for any current children need to be completed by December 1, 2016, the actual form was not available until January</p>	<p>School Enrollment" form on the day of admission on within 1 business day.</p>	
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*Gregory J. Sten*  
*Gregory J. Sten*  
 Director of OA  
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	2017. As soon as this agency had access to the form, it was completed for all current youth and any youth that had been discharged since December 1, 2016.		
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*Emily J. Storer*  
Emily Storer,  
Director of DA  
4/7/17